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7 Attorney for Jefferie Guillory

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12  
13 Plaintiff,  
14 v.  
15 JEFFERIE GUILLORY,  
16 Defendant.

Case No. 2:21-cr-00023-RFB-EJY

**STIPULATION TO CONDUCT A  
PRE-PLEA PRESENTENCING  
INVESTIGATION REPORT**

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18 IT IS HEREBY STIPULATED AND AGREED by and between Christopher  
19 Chiou, Acting United States Attorney, and Daniel J. Cowhig, Assistant United  
20 States Attorney, counsel for the United States of America, and Rene L. Valladares,  
21 Federal Public Defender, and Margaret W. Lambrose, Assistant Federal Public  
22 Defender, counsel for Jefferie Guillory, that the parties request this Court order  
23 the Department of Probation to prepare a Pre-Plea Presentence Investigation  
24 Report.

25 The stipulation is entered into for the following reasons:

- 26 1. Mr. Guillory's criminal convictions arise from cases

1 adjudicated in Texas and these convictions may make Mr. Guillory ACCA eligible.  
2 Whether Mr. Guillory is ACCA will significantly impact his sentencing exposure,  
3 negotiations, and his decision regarding how to proceed in this matter. A pre-plea  
4 presentence report will promote judicial economy and aid in the manner in which  
5 this case is ultimately resolved.

6           2.       Undersigned counsel therefore respectfully requests this Court  
7 issue an order that the Department of Probation conduct a pre-plea presentence  
8 investigation report as soon as possible.

9           3.       Undersigned counsel has spoken to the prosecutor, Assistant  
10 United States Attorney, Daniel J. Cowhig regarding this request and he has no  
11 opposition. The Department of Probation has also been made aware that this  
12 request is forthcoming.

13           This is the first stipulation filed herein.

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15           DATED this 16th day of April, 2021.

16       RENE L. VALLADARES  
17       Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

18       /s/ Margaret W. Lambrose  
19 By \_\_\_\_\_

/s/ Daniel J. Cowhig  
By \_\_\_\_\_

20       MARGARET W. LAMBROSE  
Assistant Federal Public Defender

DANIEL J. COWHIG  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3  
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 vs.

7 JEFFERIE GUILLORY,

8 Defendant.  
9  
10

Case No. 2:21-cr-00023-RFB-EJY

**ORDER**

11 IT IS HEREBY ORDERED that the Department of Probation will prepare  
12 a Pre-Plea Presentence Investigation Report for Defendant Jefferie Guillory.

13 DATED this the 23rd day of April, 2021.

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17 RICHARD F. BOULWARE, II  
18 UNITED STATES DISTRICT JUDGE  
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